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14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE DISTRICT OF NEVADA**

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17 MAYWEATHER PROMOTIONS, LLC,

18 Plaintiff,

19 vs.

20 PAC ENTERTAINMENT WORLDWIDE,
21 LLC,

22 Defendant/Counterclaim Plaintiff,

23 -and-

24 MAYWEATHER PROMOTIONS, LLC and
25 FLOYD MAYWEATHER,

26 Counterclaim-Defendants.

CASE NO. 2:24-cv-00343-MMD-NJK

**ORDER GRANTING
JOINT STIPULATION FOR
BRIEFING SCHEDULE RE:
JEFFREY MORSE & ASSOCIATES,
LTD.'S MOTION TO QUASH
SUBPOENA TO PRODUCE
DOCUMENTS, INFORMATION, OR
OBJECTS OR TO PERMIT
INSPECTION OF PREMISES**

(First Request)

27 Petitioner JEFFREY MORSE & ASSOCIATES, LTD. ("Morse"), on the one hand, and
28 Respondent PAC ENTERTAINMENT WORLDWIDE, LLC ("PAC"), on the other hand

1 (collectively, the “Parties”), by and through their respective attorneys, hereby stipulate and agree
2 as follows:

3 1. On February 13, 2024, Morse filed, in the above-captioned court, a Notice of
4 Motion and Motion to Quash a subpoena (“Motion”) served by PAC to Produce Documents,
5 Information, Or Objects Or To Permit Inspection of Premises on Non-Party First Security Credit
6 Bank Nevada (“Subpoena”) in connection with an underlying case pending in the U.S. District
7 Court for the Southern District of New York, captioned *Mayweather Promotions LLC v. PAC*
8 *Entertainment Worldwide LLC*, Case No. 21-cv-04378-JHR-JW (“New York Case”).

9 2. Attorneys for PAC were first authorized to represent Defendant in connection with
10 this case on March 15, 2024, first retained local counsel on March 27, 2024, as required by the
11 Local Rules of this Court, and were granted permission to practice in this case on April 3, 2024.

12 3. PAC respectfully requests an extension of time to respond to the Motion. Pursuant
13 to Local Rule IA 6-1(a), the reason for the extension requested is as follows: the attorneys for PAC
14 have just recently retained local counsel and were only recently granted permission to practice in
15 this case and, without the requested extension of time, PAC would be unable to timely file
16 opposition to the Motion.

17 4. Accordingly, the parties respectfully request that the schedule for briefing with
18 respect to the Motion be extended as follows: (a) PAC’s time to file its Opposition to the Motion
19 shall be extended to on or before May 3, 2024, and (b) Morse shall file its Reply in support of the
20 Motion on or before May 24, 2024.

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1 5. Pursuant to Local Rule IA 6-1(a), counsel for the parties state that this is the first
2 stipulation for an extension of time in connection with the Motion;

3 IT IS SO STIPULATED.

4 DATED: APRIL 9, 2024

EISNER, LLP

6 By: /s/ Jeremiah Reynolds
7 Jeremiah T. Reynolds (CA SBN 223554)
8 Admitted Pro Hac Vice
 433 N. Camden Drive, 4th Floor
 Beverly Hills, CA 90210

9 Attorneys for Non-Party
10 JEFFREY MORSE & ASSOCIATES, LTD.


11 DATED: APRIL 9, 2024

BERGSTEIN FLYNN KNOWLTON &
POLLINA PLLC

13 By: /s/ Lee Bergstein
14 Lee Bergstein (NY SBN 4603403)
15 Admitted Pro Hac Vice
 767 Third Ave., 14th Floor
 New York, NY 10017

16 Attorneys for Defendant
17 PAC ENTERTAINMENT WORLDWIDE, LLC

18
19 IT IS SO ORDERED:

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22 NANCY J. KOPPE
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: April 10, 2024

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27 Mayweather Promotions, LLC v. PAC Entertainment Worldwide, LLC/ Case No. 2:24-cv-00343-MMD-NJK
28 Joint Stipulation for Briefing Schedule Re: Jeffrey Morse & Associates, Ltd.'s Motion to Quash Subpoena to
 Produce Documents, Information, or Objects or to Permit Inspection of Premises